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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

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Comment submitted by William Morrow, Whitmore Farm

Submitter Information

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General Comment

I am a farmer in Frederick County, Maryland. I have an approved nutrient management plan that I implement. I have all the drainage swales & creeks fenced off from the livestock. Tom's Creek, a tributary to the Monocacy borders my property. I planted buffer strips, trees and shrubs along the drainage swales and creeks. I implement all the best management practices (BMPs) to prevent any nutrients from leaving my farm. Yet, my creek, Tom's Creek will never meet its water quality standards for nutrients and sediments because other farms in the watershed are not implementing their BMPs. It makes my efforts all seem meaningless when I see farms that border the very same creek continue to let their cows in the creek, still don't plant cover crops, and continue to spread manure on frozen ground in the winter.

All of the state and federal efforts to clean up the Bay will be meaningless without enforceable "reasonable assurances" for non-point sources. The last 26 years of education, outreach and financial assistance for reducing loads from non-point sources has brought in all the farmers that want to do the right thing and that care about the environment. Unfortunately, there are some farmers that simply don't care and will never do the right thing unless they are forced to. These sources of nutrient loadings to the Bay can only be reined in with enforceable BMPs.

Case in point, a farm right down the road from me farms over 150 acres. He grows hay, which is an environmentally good crop because it is a perennial cover crop. But, he also raises cows. An intermittent/emphemeral creek runs right thru his 1 acre concentrated animal feedlot and drains into the mainstem of Tom's Creek less than 100 yards away. He could locate those animals anywhere on that 150 acres but he chose to locate them in the low lying wet corner of his property so as not to give up 1 acre of crop land. There are countless examples of such behavior by farms. We need enforceable BMPs!